

AVANGAAD

HUMAN RIGHTS AND LABOUR PROCEDURE

HR, ADMIN & IT

Standard
Operating
Procedure

2026

DOCUMENT APPROVAL

No.	Name of Documents	Applicable for	Edition
1	Human Rights and Labour Procedure (AVANGAAD/HR-ADMIN-IT/SOP-04)	All Avangaad Berhad Staff	1

The table below lists the authorities who have sequentially reviewed and approved the current version of the document.

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Disclaimer: This procedure is intended for internal guidance purposes only and does not create any rights, obligations, or liabilities enforceable by third parties. This procedure outlines general principles and provides guidance, but it shall not be construed as a basis for any claims or liabilities against the Group by any counterparties, stakeholders, or third parties.

AUTHORIZATION

This Human Rights and Labour Procedure, Reference No. AVANGAAD/HR-ADMIN-IT/SOP-04, is hereby authorized and approved by the Chief Executive Officer (CEO) of Avangaad Berhad. It is applicable to all vessels and shore-based operations fully managed by Avangaad Berhad, as well as all departments within the organization.

1.0 PURPOSE

- 1.1 Avangaad (M) Berhad (herein referred as “the Company” or “Avangaad”) and its subsidiaries (herein referred as “the Group”) believes that everyone has the right to be treated with fairness, respect and dignity at the workplace where their knowledge, skills and abilities are the critical factors in their success. It is our aim to avoid contributing to adverse human rights impacts and mitigate any such impacts when they occur.
- 1.2 This procedure outlines our commitment to respecting the dignity, freedom, and equality of all individuals impacted by our activities.

2.0 OBJECTIVES

- 2.1 This procedure is designed to provide a framework for the Group to achieve the following:
- i. To elaborate on the company’s commitment to support human rights;
 - ii. To foster the development of in-house learning, management capacity and leadership on human rights and labour issues;
 - iii. To guide stakeholder engagement on human rights and labour issues;
 - iv. To demonstrate international good business practice.

3.0 POLICY STATEMENT

3.1 COMMITMENT TO HUMAN RIGHTS

- 3.1.1 We are committed to respecting all internationally recognized human rights as defined by the Universal Declaration of Human Rights (UDHR) and the principles contained within the United Nations Guiding Principles on Business and Human Rights (UNGPs).

3.2 SAFEGUARDING CHILDREN’S RIGHTS

- 3.2.1 The Group strictly prohibits the use of child labour in any form within our operations and supply chain. The minimum age for employment shall be guided by the Children and Young Persons (Employment) Act 1966 and Marine Labour Convention (MLC).
- 3.2.2 Besides child labour, the Group committed to upholding children’s rights in alignment with the Children’s Rights and Business Principles. We prioritize safeguarding children from harm, ensuring access to education and healthcare, promoting digital safety, and supporting vulnerable children across our operations and supply chains.

3.3 FAIR EMPLOYMENT CONDITIONS

- 3.3.1 The Group operates in full compliance with all applicable laws and regulations when it comes to minimum wages, working hours, overtime and employee benefits. We aim to limit overtime work on a strictly critical or necessary basis. We remunerate our employees equitably based on qualifications,

skills, and experience relevant to the work performance expectations. We strive to provide wages that meet or exceed living wage standards, ensuring employees can maintain a decent standard of living. Additionally, we provide recognition based on performance and contribution to the Group's success.

3.4 ELIMINATING EXCESSIVE WORKING HOURS

3.4.1 The Group committed to ensuring that all employees work within reasonable and lawful limits, in compliance with local regulations in Malaysia. We strictly adhere to the Employment Act 1955 and related labour laws, which govern working hours, overtime, and rest periods.

3.5 EQUALITY, DIVERSION AND INCLUSION

3.5.1 The Group is committed to fostering a culture of equality, diversity, and inclusion in every aspect of our operations. We believe that a diverse and inclusive environment drives innovation, strengthens our community, and enhances our ability to serve our stakeholders effectively.

3.5.2 The Group is dedicated to providing equal opportunities for all employees, regardless of gender, race, ethnicity, skin colour, religion, nationality, sexual orientation, age, marital status, pregnancy, political affiliation, or disability. We are committed to advancing gender equality by ensuring that all genders have equal access to opportunities, resources and fair treatment within the workplace. Our commitment to diversity and inclusion extends to our hiring practices, development programs, and workplace culture.

3.6 MODERN SLAVERY / FORCED LABOUR / COMPULSORY LABOUR

3.6.1 The Group will not tolerate or engage in any work or service that is forced through threats or penalties and to which the individual has not willingly consented. This prohibition includes, but is not limited to, the following indicators of forced labour, as outlined by the eleven (11) International Labor Organisation (ILO) indicators of Forced Labour:

- a) Abuse of vulnerability
- b) Deception
- c) Restriction of movement
- d) Isolation
- e) Physical and sexual violence
- f) Intimidation and threats
- g) Retention of identity documents
- h) Withholding of wages
- i) Debt bondage
- j) Abusive working and living conditions
- k) Excessive overtime

3.6.2 Due diligence in preventing modern slavery practices should not be confined to the Group but extend to the supply chain as well.

3.7 SAFE AND HEALTHY WORKPLACE

3.7.1 The Group is committed to provide a safe and healthy workplace environment for our employees, in compliance with applicable health and safety laws, regulations, and requirements. The Group is dedicated to maintaining a productive workplace and strives to implement necessary measures to prevent job-related injuries and illnesses and aims for zero fatalities.

3.7.2 The Group is also committed to maintaining a workplace that is free from violence, harassment, bullying, intimidation and other unsafe or disruptive conditions due to internal and external threats. Violence, harassment, bullying, and intimidation is not tolerated in the workplace and in any work-

related circumstance outside the workplace. Security measures for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

3.8 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

- 3.8.1 The Group supports employees' rights to freedom of association and collective bargaining, in accordance with Malaysian laws and regulations. The Group also respects intimidation or harassment. The Group also respect and support the right to collective bargaining. We are committed to establish a constructive dialogue in good faith with employees and/or their representatives.

3.9 EMPLOYEES' CONTINUOUS LEARNING AND DEVELOPMENT

- 3.9.1 The Group committed to fostering continuous learning and personal growth for all employees, regardless of gender or background. The Group provide comprehensive training programs that enhance skills and career advancement. The Group also encourage professional development through workshops, certifications, and resources, empowering employees to reach their full potential and contribute to our organization's success in a non-discriminatory environment. The Group aims to empower employees to fostering a motivated, skilled, and engaged workforce.

3.10 EMPOWERING EMPLOYEES THROUGH AWARENESS AND COMMUNICATION

- 3.10.1 The Group committed to upholding high labour standards across all operations. The Group labour standards procedure is communicated globally to all employees, ensuring awareness and understanding of their rights and responsibilities. We promote a culture of respect, compliance with local laws, and continuous improvement in labour practices to foster a safe and equitable workplace.

4.0 GRIEVANCE MECHANISM

- 4.1 The Group has established Grievance Mechanism Procedure ([AVANGAAD/HR-ADMIN-IT/SOP-02](#)) which all our stakeholders are encouraged to use to report potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices. Employee may anonymously report any violation related to this procedure via confidential e-mail at:

a) Grievance Mechanism: grievance@avangaad.com

- 4.2 The Group will investigate, address and respond to the concerns in the substantiated report and will take appropriate corrective action in response to any violation. The Company commits to remedy affected parties where it has been identified that it has directly caused or contributed to human rights impacts. The entire process and its results shall be documented and shall be properly disclosed in accordance to any applicable laws or Sustainability standards.

5.0 COMPLIANCE AND PENALTIES

- 5.1 Non-compliance with this procedure by any internal or external party, will result in disciplinary action, which may include termination of employment or business relationships.

6.0 ROLES AND RESPONSIBILITIES

- 6.1 The Chief Operating Officer (COO), assisted by the management, approves and oversees the implementation of the Human Rights and Labour Procedure, ensuring that it is integrated into the company's strategic goals, risk management frameworks, and operational procedures.

7.0 REPORTING AND DISCLOSURE

7.1 As and when necessary, the company shall periodically report and disclose the relevant metrics, targets, deliverables and achievements with regards to protecting and promoting human rights while avoiding and mitigating any human rights violations in the workplace, via mandatory or voluntary public reports and disclosures in accordance with the relevant regulations and standards.

8.0 REVIEW

8.1 This procedure shall be reviewed from time to time by the Board of Directors where deem necessary in accordance with the needs of the Company and/or Listing Requirements or any other regulatory requirements enforced at the time being.